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August 5, 2011

BILL COMBS, TREASURER 21ST CENTURY DEMOCRATS 1731 CONNECTICUT AVE NW, 2ND FLOOR WASHINGTON, DC 20009

Response Due Date 09/09/2011

IDENTIFICATION NUMBER: C00230342

REFERENCE: APRIL MONTHLY REPORT (03/01/2011 - 03/31/2011)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. Failure to adequately respond by the response date noted above could result in an audit or enforcement action. Additional information is needed for the following 4 item(s):

- 1. The beginning cash balance of this report does not equal the ending balance of your March Monthly Report (2/1/11 2/28/11). Please correct this discrepancy and amend all subsequent reports(s) that may be affected by the correction. $(2 \text{ U.S.C.} \S 434)(b)(1))$
- **2.** Your report discloses a payment(s) on Schedule B to "SD & A Teleservices, Inc." that has not been recorded on Schedule D. Debt payments must also be reflected on Schedule D. Please amend your report to clarify this discrepancy. (2 U.S.C. §434(b)(4))
- **3.** Your report does not include a Schedule H1 to disclose the ratio for the allocation of certain costs. Separated Segregated Funds and Nonconnected committees that choose to allocate administrative expenses, generic voter drive costs and expenses related to public communications referencing any party committee (but no clearly identified candidates), should disclose the allocation ratio applied to these expenses on Schedule H1. 11 CFR §104.10(b)(1)
- **4.** Schedule B discloses an expenditure(s) for "telemarketing expenses." If a portion or all of these expenditures were for public communications (as defined by 11 CFR §100.26) or voter drive activity (under 11 CFR §106.6(b) (2)(i)) containing express advocacy as defined under 11 CFR §100.22, this would constitute an in-kind contribution or an independent expenditure and should be properly disclosed on a Schedule B or E supporting Line 23 or 24 as

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appropriate. Public communications and voter drive activity that refer to a clearly identified Federal candidate, but that do not expressly advocate the election or defeat of that candidate should be reported on Schedule B for Line 21(b) of the Detailed Summary Page. Please clarify whether this activity contained express advocacy and amend your report to properly disclose this activity, if necessary.

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. Requests for extensions of time in which to respond will not be considered.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1394.

Sincerely,

Marlene Colucci

Senior Campaign Finance Analyst

Marlone D. Colucci

Reports Analysis Division